

EXHIBIT W-24

Plaintiff and County Defendants correspondence/Sanction

Re: Motion to Dismiss

Thaddeus Hackworth

Mar 27, 2024, 2:13 PM (5 days ago)

Berrien County Government, Berrien County Board of Commissioners, Shelly Weich, Lora L. Freehling, Donna Howard, R. McKinley Elliott, Hon. Mabel J. Mayfield, Ho

Barnaby's Business

Wed, Mar 27, 2:33 PM (5 days ago)

Under what grounds?

Thaddeus Hackworth

Wed, Mar 27, 2:35 PM (5 days ago)

Insufficient service of process and/or failure to state a claim. Sent: Wednesday, March 27, 2024 2:33 PM > -----> *From:* Barnaby's Bu

Barnaby's Business

Mar 27, 2024, 2:39 PM (5 days ago)

How about the other defendants?

Barnaby's Business <bossproperties96@gmail.com>

Mar 27, 2024, 2:56 PM (5 days ago)

to Thaddeus

Attention Attorney Hachworth,

First, Plaintiff Denied Concurrence on the Berrien County,s Motion to Dismiss. Second, Plaintiff contends that such Motion would warrant Sanction under; “Fed. R. Civ. P. 11(b) requires a party, including a pro se litigant, to conduct a reasonable inquiry before presenting a pleading, written motion, or other paper to the court, to confirm that the “legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law” and that the “factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery.”

Best regards

Plaintiff